

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

JUNIPER NETWORKS, INC.,

Plaintiff,

v.

GRAPHON CORPORATION and  
VERTICAL MARKETING, INC.,

Defendants.

Civil Case No. 1:09cv287 GBL/TRJ

**JUNIPER NETWORKS, INC.'S MOTION TO COMPEL GRAPHON  
CORPORATION TO PRODUCE SOURCE CODE AND RELATED  
FILES IN COMPLIANCE WITH THE PROTECTIVE ORDER**

Pursuant to Rule 37(a) of the Federal Rules of Civil Procedure and Local Rule 37(a), Plaintiff Juniper Networks, Inc. respectfully moves this Court to compel Defendant GraphOn Corporation to produce its source code and related files in compliance with the protective order and its discovery obligations under Federal Rules 26 and 34. The grounds for this motion are set forth in the accompanying memorandum of law.

Respectfully submitted,

Date: July 10, 2009

/s/Coke Morgan Stewart

Alan M. Fisch (*pro hac vice*)  
Coke Morgan Stewart (*Va. Bar No. 41933*)  
R. William Sigler (*Va. Bar No. 65940*)  
Kevin W. Jakel (*pro hac vice*)  
KAYE SCHOLER LLP  
The McPherson Building  
901 Fifteenth Street, NW  
Washington, DC 20005-2327  
Phone: 202-682-3500  
Fax: 202-682-3580  
Email: alan.fisch@kayescholer.com  
Email: coke.stewart@kayescholer.com  
Email: bill.sigler@kayescholer.com  
Email: kevin.jakel@kayescholer.com

*Attorneys for Juniper Networks, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 10, 2009, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Robert A. Angle  
Dabney J. Carr, IV  
Troutman Sanders LLP  
Troutman Sanders Building  
1001 Haxall Point  
Richmond, Virginia 23219

Joseph M. Vanek  
Jeffrey R. Moran  
Vanek, Vickers & Masini, P.C.  
111 S. Wacker Drive  
Suite 4050  
Chicago, Illinois 60606

Michael Dudley Rounds  
Melissa Pagni Barnard  
Elisabeth Virginia Bechtold  
Watson Rounds  
5371 Kietzke Lane  
Reno, Nevada 89511

/s/Coke Morgan Stewart  
Coke Morgan Stewart  
Va. Bar. No. 41933  
Attorney for Juniper Networks, Inc.  
Kaye Scholer LLP  
901 15<sup>th</sup> Street, NW  
Washington, DC 20005  
Phone: 202-682-3500  
Fax: 202-682-3580  
coke.stewart@kayescholer.com